

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABIGAIL MULLEN,)	Civil Action No. 2:20-cv-02020
)	
Plaintiff,)	Honorable J. Nicholas Ranjan
)	
v.)	
)	<i>ELECTRONICALLY FILED</i>
MSA SAFETY PITTSBURGH)	
MANUFACTURING, LLC,)	
)	JURY TRIAL DEMANDED
Defendant.)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff, Abigail Mullen, and Defendant, MSA Safety Pittsburgh Manufacturing, LLC, hereby move this Court to enter a protective order, and in support thereof, state as follows:

1. This Court entered a Case Management Order on May 7, 2021 following its Initial Case Management Conference. Doc. No. 16.
2. In that Order, the Parties were directed to file a joint motion for entry of a protective order by May 14, 2021. Id.
3. Since that time, the Parties have conferred and agreed-on the Stipulated Protective Order attached to this Motion.
4. Accordingly, the Parties request that the Court grant this Motion and enter the Stipulated Protective Order.

Dated: May 14, 2021

Respectfully submitted,

MANES & NARAHARI, LLC

JACKSON LEWIS P.C.

/s/ David M. Manes

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